

Program: Foodservice Protection

Subject: Nature and Frequency of Services

Objective: The goal of statewide foodservice protection services is the prevention of foodborne illness. Our effectiveness in this pursuit is dependent upon the ability to inform and motivate foodservice operators to employ safe food preparation practices.

Authority: §35.1-15 Training Materials; §35.1-20 Issuance and denial of licenses; and §35.1-22 Periodic Inspections, Code of Virginia.
§2.13 Issuance of Permit; §2.19 Periodic Inspection; and §2.20 Inspection Report, Rules and Regs Governing Restaurants...

Public Health Rationale: The knowledge and commitment of foodservice operators to safe food handling practices is the critical element in the day-to-day protection of public health at each permitted foodservice establishment.

Background: The higher levels of inspectional thoroughness and consistency, achieved during the past several years, has resulted in a general decrease in inspectional scores. Due to existing risk+score frequency formulas this decrease has resulted in unrealistically short inspection intervals.
The FDA and many health districts have abandoned the existing 44-item inspection tool substituting a variety of formats and services.
There is a need for new guidelines for frequency and nature of foodservice protection services and new documentation tools while defining latitude for districts to "fine-tune" their programs to meet the needs of their customers.

Procedures:

Nature of Services

Foodservice protection activities should be focused on food preparation procedures which pose a known risk of foodborne illness, while ensuring substantial compliance with the regulations in all permitted establishments. This strategy requires the use of multiple types of food protection services (or visits). These include:

A - Standard enforcement inspection - An annual enforcement inspection of every establishment, scheduled prior to the re-issuance of the establishment permit, The "Foodservice Establishment Inspection Report" (see PIM #95-04) references the relevant sections of regulations, or code, and all deficiencies will be documented. One such visit should be conducted 60-90 days prior to permit expiration. This visit would include an update of the establishment's profile and priority assessment and, if necessary, be followed by a letter advising of the

deficiencies which must be corrected prior to the re-issuance of the permit. Staggered expiration dates for permits are recommended and notice to operators of impending enforcement inspection may be considered to motivate correction of physical/structural deficiencies.

B - Critical item or critical procedures evaluation - A periodic visit during which only compliance with "critical" sections of the regulations or "critical" procedures are evaluated and documented. A "critical" section or procedure is one where failure to observe this requirement can be a direct cause of foodborne illness. The "Foodservice Critical Procedures Report" (see PM # 95-05) is one of several forms appropriate for this service which have been developed by district staff.

C - Training - The presentation of a formal training event in the establishment (i.e.: 35 minutes of video and discussion on personal hygiene delivered to 10 of kitchen staff) by the Environmental Health Specialist (EHS). Another example would be the participation by a manager/supervisor from the establishment in a certification course. This is intended to be a training event distinct from the informal one-on-one teaching that occurs in the context of an inspectional visit.

D - HACCP planning and implementation – The voluntary development and **implementation** of a formal HACCP plan for a specific menu item and subsequent visits to confirm that the monitoring (and correction action) is being done.

Frequency of Services

Each health district should develop a method for prioritizing its permitted foodservice establishments with respect to the epidemiological hazard (aka risk assessment) posed by the food preparation processes undertaken in each establishment (or class of establishments). Districts may choose to include manager training, compliance history, average daily patronage, or other factors in their prioritization. District programs would be expected to meet, or exceed, the prioritization and service delivery described herein.

The recommended format for assignment of priority is as follows:

<u>Class of Establishment</u>	<u>Expected Distribution</u>
No Potentially Hazardous Foods served	-10%
Low priority	-25%
Moderate priority	-40%
High priority	-25%

The "Expected Distribution" is based upon a query of existing data for 600-700

establishments. This distribution may vary somewhat in localities with relatively few establishments. The "Priority Assessment Tool" (Attachment 1), the existing risk assessment data, or other formats in use by the districts can be utilized to develop such a prioritization of establishments.

The nature and frequency of food protection services targeted for a specific foodservice establishment would depend upon the priority of that establishment.

For each class of establishments the following mix of services is recommended:

<u>Class of Establishment</u>	<u>No./Type of Services per year</u>
No PHFs served	1 A
Low priority	1 A + 1 additional A, B, C, or D,
Moderate priority	1 A + 2 additional A, B, C, or D,
High priority	1 A + 3 additional A, B, C, or D.

where, A = Standard enforcement inspection
B = Critical item or critical procedures evaluation
C = Training
D = HACCP planning and implementation

As an example, a moderate priority establishment in:

- locality A may receive three standard enforcement inspections in a year,,*
- locality B may receive one standard enforcement inspection and two critical procedures evaluations; and,*
- locality C may receive one standard enforcement inspection, one training event, and one HACCP planning event.*

Each of these localities would be meeting the targets for delivery of services.

Professional Judgment

These recommended types and intervals of services are not intended to replace the professional judgment of the Environmental Health Specialist Senior, Environmental Health Manager, Environmental Health Supervisor, or Health Director in recognizing the need for enforcement action or follow-up of critical deficiencies. They are intended to provide a baseline for foodservice protection services by which district programs can be evaluated.

Responsibility: The district Environmental Health Manager is responsible for the implementation of these procedures by the district foodservice protection program.

The local Environmental Health Specialist Senior is responsible for the delivery of quality foodservice protection services to specific foodservice establishments.

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Approved by: _____
Division of Food and Environmental Services

Endorsed by: _____
Director
Office of Environmental Health Services

Attachment 1: Priority Assessment

Attachment 1

Priority Assessment Tool

(1)	Are Potentially Hazardous Foods (PHFS) served? (Disregard low hazard PHFS, i.e.: frankfurters, cheese, creamers, cured meats)	Y	N
(2)	Are PHFs prepared from raw, non-frozen. ingredients?	Y	N
(3)	Are PHFs cooked, cooled, and reheated?	Y	N

Decision Tree

If Question (1) = No ,	then the establishment is	No PHFs served class.
If Questions (2) and (3) = No,	then the establishment is	Low priority class.
If Questions (2) <u>or</u> (3) = Yes,	then the establishment is	Moderate priority class.
If Questions (2) <u>and</u> (3) = Yes,	then the establishment is	High priority class.